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FILED

Sep 18 2023

Mark B. Busby

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IAN MARTIN GARCIA,
Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

Case No. 3:23-cv-00131-TSH

**STIPULATION AND ~~PROPOSED~~
ORDER FOR AN EXTENSION OF TIME**

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant shall have a 28-day extension of time, from September 18, 2023, to October 16, 2023, for Defendant to respond to Plaintiff's Opening Brief (Dkt. No. 21).

1 This is Defendant's first request for an extension of time to file a response to Plaintiff's
2 Motion. Good cause exists for this extension because Defendant's counsel is currently exploring
3 settlement options in this case. If settlement is not possible, Defendant's counsel will need
4 additional time to draft a response to Plaintiff's Motion for Summary Judgment.

5 Defendant's counsel will endeavor to complete these tasks as soon as possible. This
6 request is made in good faith and with no intention to unduly delay the proceedings, and counsel
7 apologizes for any inconvenience.

8 Plaintiff does not oppose Defendant's request for an extension of time. The parties further
9 stipulate that the deadline for any reply by Plaintiff, if necessary, will be extended accordingly.

10
11 Respectfully submitted,

12 Dated: September 18, 2023.

13 /s/ Stuart Barasch
14 (*as authorized via email on September 16, 2023)
15 STUART BARASCH
Attorney for Plaintiff

16 Dated: September 18, 2023.

17 ISMAIL J. RAMSEY
United States Attorney

18 By: /s/ Ryan Lu
19 RYAN LU
20 Special Assistant U.S. Attorney

21 Attorneys for Defendant
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ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: September 18, 2023



THE HONORABLE THOMAS S. HIXSON
United States Magistrate Judge